

JAMES J. VILT, JR. - CLERK

UNITED STATES DISTRICT COURT

U.S. DISTRICT COURT

WEST'N. DIST. KENTUCKY

Western District of Kentucky

Bowling Green Division

Case No.

1:21-cr-164-GWS

(to be filled in by the Clerk's Office)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Harvard University & Harvard Extension School; New
England Center/Home Veterans; Boston Housing
Authority

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 1:21-cr-164-EWS
(to be filled in by the Clerk's Office)

Request an
Emergency Motion for
a Temporary Restraining
Order Injunction of
Relief! (Preliminary Injunction).

Page 1 of 6

Defendant No. 1

Name Harvard University

Job or Title *(if known)* Office of the President Harvard University

Street Address Massachusetts Hall

City and County Cambridge

State and Zip Code MA 02138

Telephone Number (617) 495-1502

E-mail Address *(if known)* president@harvard.edu

Defendant No. 2

Name Harvard University School of Continuing Education

Job or Title *(if known)* Dean of Extension School Nancy Coleman

Street Address FAS Division of Continuing Brattle St 651 Brattle St

City and County Cambridge (Middlesex County)

State and Zip Code MA 02138

Telephone Number (617) 495-4024

E-mail Address *(if known)* njcoleman@fas.harvard.edu

Defendant No. 3

Name New England Center/Home Veterans

Job or Title *(if known)* Andrew McCawley, President & CEO

Street Address 17 Court Street

City and County Boston (Suffolk County)

State and Zip Code ~~MA 02138~~ 02108

Telephone Number (617) 371-1800

E-mail Address *(if known)* andrew.mccawley@nechv.org

Defendant No. 4

Name Boston Housing Authority

Job or Title *(if known)* Chris Sleison Supervisor

Street Address 52 Chauncy Street

City and County Boston (Suffolk County)

State and Zip Code MA 02111

Telephone Number 617-988-4610

E-mail Address *(if known)* chris.sleison@bostonhousing.org

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Regarding Harvard: Fifth Amendment through Fourteenth Amendment Due Process (Doe v. Purdue); U.S. Code 242 Color of Law violations, seemingly U.S. Code 241 violations (conspiracy to commit 242 with two or more people); 18 USC Ch. 73: Obstruction of Justice; 18 USC Ch. ; 18 U.S.C. § 1519. (Tampering With Evidence); 18 USC § 2261A (Stalking);

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

II. Attachment for II (A). Basis for Jurisdiction as a Federal Question, page 3 of Emergency Motion for Temporary Restraining Order Injunction Relief & Complaint.

A. Additional Federal law violation from Harvard & Harvard School of Continuing Education:

- Title IX violations from Harvard defendant's, multiple violations, including against my teaching assistant, victim of human trafficking;
- 18 U.S. Code § 1001 (a) (1)- Statements or entries generally (fraudulent claims, behavior).

B. Federal violations for New England Center/Home Veterans & Boston Housing Authority:

- Section 109 of the Housing and Community Development Act of 1974 and Title IX of Education Amendments of 1972 (due to the direct connection with the Harvard Defendant's violation of Title IX Sex based discrimination'
- 42 U.S.C. 3601;
- Due Process: Substantive & Procedural Due Process partiality, discriminatory treatment;
- 18 U.S. Code § 1001 (a) (1): Statements or entries generally (fraudulent claims, behavior).

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

Regarding Harvard and Harvard School of Continuing Education: Cambridge MA; Boston MA; Minneapolis MN; Madison WI.

Regarding New England Center/Home Veterans: Boston MA.

Regarding Boston Housing Authority: Boston MA.

B. What date and approximate time did the events giving rise to your claim(s) occur?

Regarding Harvard & Harvard School of Continuing Education: from September 2018 until the present, specific dates recorded in volumes of emails (pictures too from February 2020; June 2021; & August 2021);

Regarding New England Center/Home Veterans: From December 2019 until the present: multiple email strings substantiating the concerns and violations;

Regarding Boston Housing Authority: March 29th 2021 until the present. Multiple emails substantiating the concerns and violations.

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)
Please See attachment for III. part C that provides the complete facts underlying my claim(s):

Regarding Harvard University, Harvard University School of Continuing Education (& Harvard police):

On January 31st 2019, Harvard University Extension School Administratively Withdrew me suddenly and without Due Process (Doe v Purdue), not citing any specific violations and not providing me any notice or hearing to inquire why. I was informed I should contact the Secretary of the Administrative Board for Harvard University, one Susan Donnelly about how to be reinstated if I desired to be. I had been officially admitted in the Harvard Extension School's Masters Liberal Arts (ALM) International program on early morning January 15th 2019. I was notified on January 31st 2019 that I had been administratively withdrawn.

On January 15th 2019, three hours after I was notified of my admissions into the ALM program, I

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

I am 56 years old; my economic and personal well-being have been severely negatively impacted by the loss of a Master's Degree from Harvard University and the loss of a livable situation. Harvard has many other recent lawsuits which cite the same violations of civil rights; Harvard's own internal and external reviews substantiate that my concerns are not isolated but a continued pattern of such civil right violations, including Title IX, which applies to me through Doe v Purdue (more so since I never had intimate relations with my former teaching assistant). There is clear evidence that Harvard wilful negligence, arguably criminal negligence is due directly to human trafficking and commercial sex at Harvard, both which seem to fall under Jeff Epstein extensive presence on campus through late 2028 and for sure the involvement of Izhak Cohen/Tracey Reynolds prostitution ring which included Harvard (they were arrested on February 11th 2020, a week after my teaching assistant sent me two nude pictures from a Harvard apartment located two blocks from the instructor of our Fall 2018 class). These egregious extenuating circumstances are causing additional injury. The ongoing and increased emotional duress and economic damage from the defendants refusal to stop their intentional violation of my civil rights is irreparable and worsening, with the injuries compounding each day.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I request this Court provide me immediate relief from the ongoing, intentional violations of such civil right violations.

There is no money which can reverse the irreparable injury from these defendants behavior. The emotional, physical, and economic injury the defendants have caused and are willfully perpetuating is compounding itself each day.

I seek through this Emergency Motion for a Temporary Restraining Oder Injunction that this Court order the defendants to cease their violations and to remedy the wrongs.

I seek this court to reinstate me into my Harvard Graduate program, with damages to be decided at a later hearing (at least being reinstated reduces the immediate injury).

III. Statement of Claim C (continued):

Regarding Harvard University, Harvard University School of Continuing Education (& Harvard police):

On January 31st 2019, Harvard University Extension School Administratively Withdrew me suddenly and without Due Process (Doe v Purdue), not citing any specific violations and not providing me any notice or hearing to inquire why. I was informed I should contact the Secretary of the Administrative Board for Harvard University, one Susan Donnelly about how to be reinstated if I desired to be. I had been officially admitted in the Harvard Extension School's Masters Liberal Arts (ALM) International program on early morning January 15th 2019. I was notified on January 31st 2019 that I had been administratively withdrawn.

On January 15th 2019, three hours after I was notified of my admissions into the ALM program, I received an email from a Harvard police officer stating that Ms. Tanna Wise had filed a complaint against me for harassing her. The police officer did not provide a complaint; Harvard police refuses to provide a copy: after six requests for a copy of the complaint, I still have not received a copy. The police officer threatened me with both jail and fines if I contacted Tanna Wise (I had no intention to contact her at that point or after my last inquiry about my section grade from her on January 8th 2019). The police officer's January 15th 2019 email threatening me with jail and fines is a U.S. Code 242 Color of Law violation, seemingly a preface of intimidation and retaliation before fulfilling the ongoing Due Process violation by suddenly withdrawing me without any hearing or chance to explain my side on January 31st 2019. The only reason provided was "too many emails", though no specific conduct code violation or incident was cited. The reason for the increasing emails was due to the increasing silence and aversion to provide oversight with Tanna Wise and the ongoing violation of the Harvard non-retaliation policy and other Harvard police e.g. the Harvard grade policy was violated too in early 2019.

On April 9th 2019, after my second request for a copy of the complaint, Harvard police misled Ohio State personnel to block access to my Ohio State emails which composed all of the facts for the March 14th 2019 Federal Injunction for Relief--Ohio State finally returned my email data in early July 2019 after I informed the Ohio State Vice General Counsel in June 2019 and other Ohio State officials earlier on, beginning in April 2019. There is good reason to believe that Robert Neugeboren is part of the misuse of a complaint as a means to retaliate and intimidate me from further inquiry and the reason I was suddenly withdrawn without any Due Process or specific reason stated.

Regarding New England Center/Home Veterans & Boston Housing Authority:

In late December 2019 while I lived in the New England Center for Veterans in downtown Boston, a veteran named "Joshua flagged me down and asked me if I was familiar with Trinity Boston Church and knew anything about Family probate matters. I had never seen or hear of this Joshuas in the previous two and half weeks living in New England Center. But Josuah did not

wear his name tag as the rules direct. Joshua's two questions had direct relevance to my life: I had arranged for Tanna Wise to meet me on Sunday December 15th at Trinity Boston to ascertain how much Harvard was coercing and who else was involved, for her to meet me there at 6 PM service. Tanna arrived at 6 PM and sat behind me, then a plain cloth security guard sat down immediately next to me even though the entire row was empty other than myself. This plain cloth security guard had made countenance with Tanna before sitting down. I picked up right away that something was not right. When I got up and left, I found a control card for a protective service firm parked immediately across the street with the driver looking down and a large antenna sticking up. Michigan State was caught paying 500,000.00 dollars for spying on victims with the Nasser scandal, so I was not surprised that Harvard would outsource the same. I saw Susan Donnelly approaching me at 7:35 PM; I had told Tanna that we could speak briefly after the service ended at 7PM, so I waited around the area to see what would unfold. I lost Susan Donnelly after she walked by through an Alley to the side, seeing her run back after seeing around the corner that she turned around and did not see me. When she ran to the other corner from which she originated, I took off in a new direction across the street and ended up at The Corner Pub where Aysha appeared later on; Aysha was drunk when she appeared the night of December 15th and made her lewd comments; she was sober the next night with Nidia Fevry. Just so, between Joshua introducing the Trinity Boston Church and Family probate, I knew right away he has an ulterior motive; it turned out that he never attended the Trinity Boston Church as he claimed, he almost forgets that he introduced the concern on December 29th/30th--I have the email string I started that day, sharing it to good friends, one who fully understands these types of situations.

Joshua would stop down and ask me about a woman without using her name. I would share just enough with him to pique his response. He stated one time in January, "as long as you do not ruin it". I did not know what he meant but leaned towards the harsh reality that there was trafficking/prostitution going on with Tanna, Nidia, and Aysha--perhaps Susan Donnelly too? Finally, when I told Joshua on Thursday February 6th that Tanna sent me nude pictures on February 4th, he asked if he could see them. When I open up the pictures, he stated, "I wonder where they have her?". I knew then for sure that he had entered the New England Center for ulterior motives. Joshua had told me he had moved to Boston from Texas. When I asked him if he had lived in San Antonio, he stated yes, that he use to "Philander", that he had no mother growing up. Tanna Wise moved to Boston from San Antonio.

The New England Center for Veterans failed to respond to my concerns with Joshua. I left Boston on February 15 due to the harassment of a couple of veterans putting dust type material in the duck work and also wanting to return to WI for other reasons. Then Covid occurred. I had some rough spots in WI and returned to Boston and the New England Center to inquire more about the plight of Tanna. By this time, Tanna and I would communicate in an around about way; it was clear she was a victim of trafficking. It was clear she had not returned to Johns Hopkins for the fall 2019/spring 2020 for her second year. And, New England Center for Veterans told me I could be housed in a permanent housing situation within two months located on their complex; I returned in early July 2020. It took ten months to be finally housed, with my concerns that I could move on to other options if they did not house me soon. Each time, I was

told, "don't leave, you are almost there, within the next thirty days". I had been told by one veteran in February that staff thought I was undercover law enforcement, that they were going to bring me down, that they were intruding into my internet and emails. I had picked up those other veterans clearly spoke about content only which would be found in my emails but which was never shared with anyone. I got along with a lot of veterans; there is a lot of good staff and great people. But there is also some bad staff, with word being there is some embezzlement occurring. The New England Center always had problems with drug dealing. Every once in a while, there would be a death from overdose; the prevailing culture is not one of active recovery. I finally gave the Vice President of Operations Brian Reeves an ultimatum in late March: either place me in a permanent housing situation or I would move on and exercise other options. When I signed my lease on March 29th, I was NOT informed about a problematic person named Nathan Welsch. When the property manager gave me the key on March 30th 2021, he stated, "there are some things I have to tell you". A veteran friend has been sharing with me from the fall 2020 about a problem resident on his floor that vandalized his bikes and harassed him. Brian Reeves would not take action. It turns out the person that I was place next to is the same problem person, one Nathan Welsh. The other victimize veteran lives across the floor from him. I was placed immediately next to Welsch on March 30th 2021.

From April 1st 2021 through the Saturday May 15th when I moved out so I could sleep without fear of all night interruptions by Nathan Welsch, the police were called several times a week sometimes twice in one night due to the loud music and other harassing behavior. I learned the smell coming in through my window was Meth. Brian Reeves and staff did nothing. They intentionally place me next to this problematic person, intentionally failed to inform me about him before I signed the lease, and they are intentionally not resolving the problem. Word from other veterans is that Natan Welsch "has dirt" on Carlton Johnson, the property manager. The lease is actually held by Boston Housing Authority. I believe and others in my support network that New England Housing purposely placed me next to this guy to slow me down from filing in Federal Court since they knew I planned on doing so. Boston Housing Authority too has failed to remove the problem person or take appropriate legal action. New England Center knew about this guy's behavior dating back to May 2020. It appears that drug dealing networks have corrupted some people. I have been homeless since May 16th 2021 but am sleeping better on the street than I was in my leased residence. Due to the connectivity with my Harvard/Tanna Wise concern, I am including New England Center and Boston Housing Authority as defendants.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: December 10th 2021

Signature of Plaintiff

Printed Name of Plaintiff

John B. Gardner

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address